

MARIA-COSTANZA BARDUCCI
BARDUCCI LAW FIRM
PLLC
5 WEST 19TH STREET, 10TH
FLOOR NEW YORK, NEW
YORK 10011 TELEPHONE:
212-433-2554

November 15, 2023

Honorable Arun Subramanian
U.S. District Court Judge
Southern District of New York
500 Pearl St,
New York, NY 10007

Plaintiff's motion is GRANTED.
The Clerk of Court is directed to
terminate the motion at ECF No.
10.

SO ORDERED.



Arun Subramanian, U.S.D.J.
Date: November 16, 2023

Re: Alexander Gomez vs. 36W26 Owner LLC and Hibase 36W INC
Civil Action No.: 1:23-cv-08681-AS
Motion to Adjourn Conference

Dear Honorable Judge Subramanian,

We represent Plaintiff in the above-styled action. Pursuant to the the Court's Order [DE#9], the Parties file this letter motion in support of a motion for an adjournment of the current Initial Conference of November 20, 2023 and the ancillary Joint Letter and Case Management Plan, which are Due November 16, 2023.

Paramount though, Defendant **36W26 Owner LLC, nor Hibase 36W INC**, have yet appeared in this action despite being served by the Secretary of the state on October 17, 2023 [see DE#7-8], and their answers are due, that time being November 7, 2023. The Plaintiff has sent Defendants a warning letter noticing them of their obligations to which their answers to the Complaint are past due, and advising each Defendant that Plaintiff will be requesting a default if they do not file an answer or response by November 27, 2023.

For these reasons, Plaintiff requests an adjournment of the initial status conference and its associated deadlines, given the Plaintiff cannot draft a CMP without at least one other party appearing, and further requests permission to move for clerk certificates of default by November 27, 2023 if still no appearance is made. Thank you for your time in considering this request.

Most Respectfully,

BARDUCCI LAW FIRM

PLLC

Maria-Costanza Barducci Esq.

cc: Via CM/ECF Only